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March 7, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080

Dear Judge Martinotti:

In accordance with Paragraph 4(b) of MDL Case Management Order #1, we write on behalf of all parties to provide the following proposed agenda for the case-management conference scheduled for 11:00 a.m. on Tuesday, March 12, 2024:

1. Proposals for MTD briefing
2. Discovery
  - a. Protocol negotiations
    - i. Protective Order
    - ii. ESI Protocol
  - b. Discovery Plan/Status of Rule 26 conferral
  - c. Raising disputes
3. SFP DFO
4. MDL Expense fund

Also enclosed for the Court's reference is a current MDL case list.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi  
James E. Cecchi  
*Liaison Counsel for*  
*Third-Party Payer Track*

/s/ Joanne Cicala  
Joanne Cicala  
*Liaison Counsel for*  
*The State Attorneys General Track*

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/s/ David R. Buchanan

David R. Buchanan

*Liaison Counsel for*

*Self-Funded Payer Track*

/s/ John D. Tortorella

John D. Tortorella

cc: Hon. Rukhsanah L. Singh, U.S.M.J.  
All counsel of record

***In re Insulin Pricing Litigation (MDL No. 3080)*****Case No. 2:23-md-03080-BRM-RLS****Case List as of March 7, 2024**

<b>Case Name</b>	<b>Case No.</b>
<b>Self-Funded Payer Cases</b>	
County of Monmouth, New Jersey v. Eli Lilly and Company, et al.	2:23-cv-03916
Cattaraugus County, New York v. Eli Lilly and Company, et al.	2:23-cv-04384
Jackson County, Missouri v. Eli Lilly and Company, et al.	2:23-cv-04531
City of Cleveland, Ohio v. Eli Lilly and Company, et al.	2:23-cv-04544
County of Albany, New York v. Eli Lilly and Company, et al.	2:23-cv-07042
Lake County, Illinois v. Eli Lilly and Company, et al.	2:23-cv-08487
Bossier Parish v. Eli Lilly and Company, et al.	2:23-cv-10910
Steuben County, New York v. Eli Lilly and Company, et al.	2:23-cv-18249
Cortland County, New York v. Eli Lilly and Company, et al.	2:23-cv-18314
Livingston County, New York v. Eli Lilly and Company, et al.	2:23-cv-18351
Schenectady County, New York v. Eli Lilly and Company, et al.	2:23-cv-20375
Cuyahoga County v. Eli Lilly and Company, et al.	2:23-cv-21082
King County v. Eli Lilly and Company, et al.	2:23-cv-21178
Pinellas County, Florida v. Eli Lilly and Company, et al.	2:23-cv-21381
City of Alexandria, Virginia v. Eli Lilly and Company, et al.	2:23-cv-22769
County Board of Arlington County, Virginia v. Eli Lilly and Company, et al.	2:23-cv-22776
Spokane County v. Eli Lilly and Company, et al.	2:23-cv-22847
Board of County Commissioners of Washington County, Maryland v. Eli Lilly and Company, et al.	2:23-cv-22917
Henrico County, Virginia v. Eli Lilly and Company, et al.	2:23-cv-23042
The Board of County Commissioners of St. Mary's County, Maryland v. Eli Lilly and Company, et al.	2:23-cv-23090
Anne Arundel County, Maryland v. Eli Lilly and Company, et al.	2:24-cv-00384
County of Wayne, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00523
City of Roanoke, Virginia et al. v. Eli Lilly and Company, et al.	2:24-cv-00559

<b>Case Name</b>	<b>Case No.</b>
Erie County, New York v. Eli Lilly and Company, et al.	2:24-cv-00632
Onondaga County, New York v. Eli Lilly and Company, et al.	2:24-cv-00646
Niagara County, New York v. Eli Lilly and Company, et al.	2:24-cv-00652
Broome County, New York v. Eli Lilly and Company, et al.	2:24-cv-00692
Oneida County, New York v. Eli Lilly and Company, et al.	2:24-cv-00694
Washtenaw County, Michigan, et al. v. Eli Lilly and Company, et al.	2:24-cv-00717
Macomb County, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00719
Monroe County, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00720
Warren County, New York v. Eli Lilly and Company, et al.	2:24-cv-00992
LDG Medical Services Group, L.L.C., et al. v. Eli Lilly and Company, et al.	2:24-cv-00725
<b>State Attorney General Cases</b>	
State of Montana, ex rel. Austin Knudsen v. Eli Lilly and Company, et al.	2:23-cv-04214
State of Kansas, ex rel., Kris W. Kobach, Attorney General v. Eli Lilly and Company, et al.	2:23-cv-04219
State of Arkansas, ex rel. Tim Griffin, Attorney General v. Eli Lilly and Company et al.	2:23-cv-04239
State of Illinois, ex rel. Raoul v. Eli Lilly and Company et al.	2:23-cv-04242
State of Mississippi, ex rel. Lynn Fitch Attorney General v. Eli Lilly and Company et al.	2:23-cv-04364
State of Kentucky, ex rel. Daniel Cameron v. Novo Nordisk Inc., et al.	2:23-cv-21374
The State of Louisiana v. Sanofi-Aventis U.S. LLC et al.	2:23-cv-22978
Arizona v. Optum Incorporated et al.	2:24-cv-00260
State of Utah et al. v. Eli Lilly and Company et al.	2:24-cv-00536
<b>Third-Party Payer Class Cases</b>	
Sheet Metal Workers Local No. 25 Health and Welfare Fund v. Eli Lilly and Company, et al.	2:23-cv-14371
Local 464A UFCW Welfare Services and Benefit Funds individually and on behalf of all other similarly situated v. Eli Lilly and Company, et al.	2:23-cv-20842

Case Name	Case No.
Local 837 Health and Welfare Plan, individually and on behalf of all other similarly situated v. Eli Lilly and Company, et al.	2:23-cv-20932
Local No. 1 Health Fund, and Plan of Benefits for the Local No. 1 Health Fund, individually and on behalf of all others similarly situated v. Eli Lilly and Company, et al.	2:23-cv-21160
Indiana/Kentucky/Ohio Regional Council of Carpenters Welfare Fund, individually and on behalf of all others similarly situated v. Eli Lilly and Company, et al.	2:23-cv-22305